

Exhibit B

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:

Eduardo Garcia and Julia Escamilla

Case No.: 11-22208

Judge: Jack B. Schmetterer

Chapter: 7

, Debtor(s)

NOTICE OF MOTION

TO: See Attached Service List

PLEASE TAKE NOTICE that on **Tuesday February 4, 2020, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, I will appear before the Honorable Jack B. Schmetterer, Bankruptcy Judge, or any other judge sitting in his stead, in Room **682**, the courtroom usually occupied by him, in the United States Courthouse, 219 S. Dearborn, Chicago, Illinois and then and there present Debtors' **Motion to Re-Open to Amend Schedules**, a copy of which is attached hereto, at which time and place you may appear if you see fit.

/s/ Salvador J. Lopez

Salvador J. Lopez
ARDC # 6298522
Robson & Lopez LLC
180 W. Washington, Suite 700
Chicago, IL 60602
(312) 523-2021

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice and the attached Motion or Document(s) were filed with the court on January 28, 2020, and that the persons indicated by an asterisk (*) are registrants with the Court's CM/ECF system and have, pursuant to Fed. R. Bankr. P. 7005 and 9036, and §II.B.2 of the Court's Administrative Procedures waived the right to receive notice of hearings and service of documents by personal service or first class mail in this case and consented to receive notice and service electronically; and that all other persons listed above and/or in the attached service list, were served by first class mail, on January 28, 2020.

/s/ Salvador J. Lopez

SERVICE LIST

*Andrew J Maxwell, Esq.
maxwelllawchicago@yahoo.com, amaxwell@ecf.epiqsystems.com;
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*Patrick Layng
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Chicago, IL 60604
USTPRegional11.ES.ECF@usdoj.gov

SEE CONTINUATION PAGES FOR ADDITIONAL PARTIES SERVED

THD/CBSD
PO Box 6497
Sioux Falls, SD 57117-6497

Transworld Systems, Inc.
Collection Agency
1375 East Woodfield Rd., Suite #110
Schaumburg, IL 60173-5423

United Collection Bureau, Inc.
5620 Southwyck Blvd.
Toledo, OH 43614-1501

Andrew J Maxwell ESQ
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Eduardo Garcia
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John A Rottier
Katz Law Office
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Chicago, IL 60623-4313

Julia Escamilla
407 Beach Ave
La Grange Park, IL 60526-5713

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

American Honda Finance
2170 Point Blvd
Suite 100
Elgin, IL 60123

Nationwide Credit & Collection, Inc
815 Commerce Drive, Suite 100
Oak Brook, IL 60523

Sprint
P.O. Box 4191
Carol Stream, IL 60197

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

End of Label Matrix
Mailable recipients 36
Bypassed recipients 1
Total 37

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MOTION TO RE-OPEN CASE TO AMEND SCHEDULES

NOW COME Debtors, Eduardo Garcia and Julia Escamilla (“Debtors”), and in support of their Motion to re-open and amend schedules, state as follows:

1. Debtors filed this Chapter 7 Bankruptcy on May 26, 2011.
2. Debtor’s received an order of discharge in this case on September 7, 2011.
3. Debtors recently learned of a previously unknown asset, a claim against Wells Fargo Bank, N.A.
4. Since Debtors were unaware of this asset at the time they filed their bankruptcy, they did not disclose it in their bankruptcy petition and schedules.
5. Debtors now wish to re-open their bankruptcy case and amend their schedules to disclose the newly discovered asset.

WHEREFORE, Debtors requests that this Honorable Court grant the motion and enter an order:

- A. Re-opening their Chapter 7 Bankruptcy Case allowing them to amend their schedules;
- B. Any other relief that is just and proper.

Respectfully submitted,

/s/ Salvador J. Lopez
Attorney for Debtor

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